

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

KÉTO NORD HODGES, *et al.*,

Plaintiffs,

v.

Case No. 8:24-cv-879

BEN ALBRITTON, *etc., et al.*,

Defendants.

_____ / _____

DEFENDANTS' OBJECTIONS TO PLAINTIFFS' EXHIBIT LIST

_____ Government _____ Plaintiff _____ Defendant _____ Court

Joint Defendants' Objection Key: R- Relevance; H- Hearsay; F- Foundation; A-Authentication; C- Completeness; IO-Impeachment Only Ok

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
1.				Use All Parties' Jt. Ex. 1	2021-09-20 Reapportionment Committee Transcript P-000055-P-000138
2.				Use All Parties' Jt. Ex. 4	2021-10-11 Reapportionment Committee Transcript P-000229-P-000363
3.				Use All Parties' Jt. Ex. 7	2021-10-18 Reapportionment Committee Transcript P-001682-P-001704
4.			Ferrin, Warren	H, R, F	2021-11-16 Congressional Reapportionment Subcommittee Transcript P-000480-P-000547
5.				Use All Parties' Jt. Ex. 10	2021-11-17 Legislative Reapportionment Subcommittee Transcript P-000649-P-000683
6.				Use All Parties' Jt. Ex. 14	2021-11-29 Legislative Reapportionment Subcommittee Transcript P-000797-P-000808

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7.			Ferrin	H, R, F	2022-01-10 Congressional Reapportionment Subcommittee Transcript P-001705-P-001724
8.				Use All Parties' Jt. Ex. 16	2022-01-10 Legislative Reapportionment Subcommittee Transcript P-000939-P-000987 Ferrin Dep. Ex. 11
9.				Use All Parties' Jt. Ex. 19	2022-01-13 Reapportionment Committee Transcript P-001725-P-001776
10.				Use All Parties' Jt. Ex. 22	2022-01-19 Senate Session Transcript P-001777-P-001805
11.				Use All Parties' Jt. Ex. 23	2022-01-20 Senate Session Transcript P-001806-P-001820
12.			Driskell	H, R, F	2022-02-02 House Session Transcript P-1850-P-1889
13.				Use All Parties' Jt. Ex. 24	2022-02-03 Senate Session Transcript P-001821-P-001824
14.				Use All Parties' Jt. Ex. 2	2021-09-20 Reapportionment Committee Meeting Packet P-000007-P-000049
15.				Use All Parties' Jt. Ex. 5	2021-10-11 Reapportionment Committee Meeting Packet P-000156-P-000225
16.				*	2021-10-18 Rodrigues Memo re Committee Directives P-000002-P-000004 Ferrin Dep. Ex. 02
17.				Use All Parties' Jt. Ex. 8	2021-10-18 Reapportionment Committee Meeting Packet P-000388
18.				*	2021-11-08 Rodrigues Memo re Important Updates
19.				*	2021-11-10 Ferrin Memo re Staff-Produced Maps P-000005-P-000006

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
20.			Ferrin, Warren	H, R, F	2021-11-16 Congressional Reapportionment Subcommittee Meeting Packet P-000393-P-000476
21.			Ferrin, Warren	H, R, F	2021-11-16 Congressional Reapportionment Subcommittee Video
22.				Use All Parties' Jt. Ex. 11	2021-11-17 Legislative Reapportionment Subcommittee Meeting Packet P-000563-P-000646
23.				Use All Parties' Jt. Ex. 12	2021-11-17 Legislative Reapportionment Subcommittee Video SEN-0000991-
24.				*	2021-11-24 Ferrin Memo re Additional Maps
25.			Ferrin	H, R, F	2021-11-29 Congressional Reapportionment Subcommittee Meeting Packet P-000684-P-000734
26.				Use All Parties' Jt. Ex. 15	2021-11-29 Legislative Reapportionment Subcommittee Meeting Packet P-000739-P-000791
27.				*	2021-12-08 Rodrigues Memo re Reapportionment Update
28.			Ferrin	H, R, F	2022-01-10 Congressional Reapportionment Subcommittee Meeting Packet P-000809-P-000870
29.				Use All Parties' Jt. Ex. 17	2022-01-10 Legislative Reapportionment Subcommittee Meeting Packet P-000876-P-000932
30.				Use All Parties' Jt. Ex. 18	2022-01-10 Legislative Reapportionment Subcommittee Video SEN-0000995-
31.				Use All Parties' Jt. Ex. 20	2022-01-13 Reapportionment Committee Meeting Packet P-000988-P-001633
32.				Use All Parties' Jt. Ex. 21	2022-01-13 Reapportionment Committee Video SEN-0000989-
33.			Ferrin, Warren	F, H, R	2022-01-16 Newman Plan 79 Suggestion Form

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34.			Ferrin, Warren	F, H, R	2022-02-14 Newman Plan 94 Suggestion Form
35.			Ferrin, Warren	F, H, R	2022-04-13 Kelly Plan 109 Suggestion Form
36.			Ferrin, Warren	F, H, R	2022-04-13 Rodrigues Memo re DeSantis Map Submission
37.				F, H, R	2015-11-23 LWV v. Detzner, Plfs' Withdrawal of Certain Proposed Alternative Remedial Plans
38.				F, H, R	2015-12-13 LWV v. Detzner, Jt. Stip. re Minority Districts
39.				F, H, R	2015-12-30 LWV v. Detzner, Final Judgment
40.				A, F, H, R	2015-08-14 Dep't of State Directive 2015-02 Matthews Dep. Ex. 2
41.				*	Stipulation re 2015 Plans
42.				*	Senate's Responses to Plfs' First Set of Requests for Admission Ferrin Dep. Ex. 04
43.				*	Senate's Responses to Plfs' First Set of Interrogatories
44.				*	Senate's Responses to Plfs' Send Set of Interrogatories
45.				*	Senate's Responses to Plfs' Third Set of Interrogatories
46.				*	Secretary's Reponses to Plfs' Second Set of Interrogatories
47.				*	Secretary's Reponses to Plfs' Third Set of Interrogatories
48.				*	Secretary's Responses to Plfs' First Set of RFAs Mathews Dep. Ex. 5
49.				*	Secretary's Responses to Plfs' First Set of Interrogatories Mathews Dep. Ex. 6
50.				H, IO	Adkins Transcript
51.				H, IO	Barreto Deposition Transcript
52.				H, IO	Ferrin Deposition Transcript
53.				*	Isbell Deposition Transcript
54.				H, IO	Matthews Deposition Transcript
55.				H, IO	McCartan Deposition Transcript
56.				H, R, IO	Plf Azis Deposition Transcript
57.				H, IO	Plf El-Amin Deposition Transcript
58.				H, IO	Plf Nord Deposition Transcript
59.				H, IO	Plf Seymour Deposition Transcript
60.				H, IO	Trende Deposition Transcript
61.				H, IO	Voss Deposition Transcript

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62.				*	Warren Deposition Transcript
63.			Barreto	H	P063 Barreto Report
64.			Barreto	H	P064 Barreto Rebuttal Report
65.			McCartan	H	P065 McCartan Report
66.			McCartan	*	P066 McCartan Instructions
67.			Barreto	*	Barreto Report Fig. 1
68.			Barreto	*	Barreto Report Fig. 2
69.			Barreto	*	Barreto Report Fig. 3
70.			Barreto	*	Barreto Report Fig. 4
71.			Barreto	*	Barreto Report Fig. 5
72.			Barreto	*	Barreto Report Fig. 6
73.			Barreto	*	Barreto Report Fig. 7
74.			Barreto	*	Barreto Report Fig. 8
75.			Barreto	*	Barreto Report Fig. 9
76.			Barreto	*	Barreto Report Fig. 10
77.			Barreto	*	Barreto Report Fig. 11
78.			Barreto	*	Barreto Report Fig. 12
79.			Barreto	*	Barreto Report Fig. 13
80.			Barreto	*	Barreto Report Fig. 14
81.			Barreto	*	Barreto Report Fig. 15
82.			Barreto	*	Barreto Report Fig. 16
83.			Barreto	*	Barreto Report Tbl. 1
84.			Barreto	*	Barreto Report Tbl. 2
85.			Barreto	*	Barreto Report Tbl. 3
86.			Barreto	*	Barreto Report Tbl. 4, pt. 1
87.			Barreto	*	Barreto Report Tbl. 4, pt. 2
88.			Barreto	*	Barreto Report Tbl. 5
89.			Barreto	*	Barreto Report Tbl. 6A
90.			Barreto	*	Barreto Report Tbl. 6B, pt. 1
91.			Barreto	*	Barreto Report Tbl. 6B, pt. 2
92.			Barreto	*	Barreto Report Tbl. 6B, pt. 3
93.			Barreto	*	Barreto Common Cause Report Fig. B16
94.			Barreto	*	Barreto Common Cause Report Fig. B17
95.			Barreto	*	Barreto Rebuttal App'x A, pt. 1
96.			Barreto	*	Barreto Rebuttal App'x A, pt. 2
97.			McCartan	*	McCartan Report Fig. 1 Enacted Plan
98.			McCartan	*	McCartan Report Fig. 2 Plan A
99.			McCartan	*	McCartan Report Fig. 3 Plan B
100.			McCartan	*	McCartan Report Fig. 4 Plan C
101.			McCartan	*	McCartan Report Fig. 5
102.			McCartan	*	McCartan Report Fig. 6
103.			McCartan	*	McCartan Report Fig. 7
104.			McCartan	*	McCartan Report Fig. 8
105.			McCartan	*	McCartan Report Fig. 9

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106.			McCartan	*	McCartan Report Fig. 10
107.			McCartan	*	McCartan Report Fig. 11
108.			McCartan	*	McCartan Report Fig. 12
109.			McCartan	*	McCartan Report Fig. 13
110.				H	Adkins Report Adkins Dep. Ex. 2
111.				*	Adkins CV Adkins Dep. Ex. 1
112.			Adkins	A, F, H	Adkins Dep. Ex. 3, Fair Districts Text
113.			Adkins	A, F, H	Adkins Dep. Ex. 4, Fair Districts Petition Form
114.				H	Trende Report Trende Dep. Ex. 1
115.				H	Voss Report Voss Dep. Ex. 2
116.				*	Voss CV Voss Dep. Ex. 1
117.			Voss	A, C, F, R	Voss Dep. Ex. 3, Florida Constitution
118.			Voss	H, R	Voss Dep. Ex. 6, Assessment re Graham v. Adams
119.			Klas	F, H, R	2015-10-13 Bradenton Herald, Top Democrat releases first proposed redistricting map for Florida Senate
120.				F, H, R	2015-10-20 FlaPol, 2 more maps filed for Senate redistricting
121.			Klas	F, H, R	2015-10-21 Times, Bill Galvano offers a new map and alternative plan for choosing who avoids re-election
122.			Klas	F, H, R	2015-10-21 Times, Galvano picks a map and offers up new idea for deciding who avoids reelection
123.				F, H, R	2015-10-22 Tampa Tribune, Senate Maps Need Not Be Color Coded
124.				F, H, R	2015-10-23 News-Press, Redistricting could lead to new races
125.				F, H, R	2015-10-23 Tampa Tribune, Senators Still Pitching Maps to Settle Districts
126.				F, H, R	2015-10-24 News-Press, Court-Ordered Redistricting Could Put All Senate Seats on Ballot
127.				F, H, R	2015-10-26 FlaPol, Oscar Braynon files five more Senate maps

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
128.			Ogles, Warren	F, H, R	2021-11-17 FlaPol, Can SD 19 lines shift to only Hillsborough and still remain a minority district
129.			Ogles, Warren	F, H, R	2021-11-17 FlaPol Tweet, Can SD 19 move to Hillsborough and still remain a minority district
130.			Klas, Warren	F, H, R	2021-11-17 Herald, Experts challenge Senate maps in Tampa region
131.			Klas, Warren	F, H, R	2021-11-18 Times, Florida Senate maps of Tampa Bay district draw complaints from experts
132.			Ogles	F, H, R	2022-01-10 FlaPol, Florida Senate prepares for major week in redistricting saga P-001839-P-001844
133.				F, H, R	2022-01-22 Times, A Senate district is split by Tampa Bay. Black organizers ask if it's time to change
134.				*	2021-09-02 Emails Ausley Warren NORD-NW 18418-NORD-NW 18420
135.				*	2021-10-13 Emails Warren Grimes Gross Prison Gerrymandering Inquiry SOS_Hodges_0000215- SOS_Hodges_0000216
136.				*	2021-10-14 Emails Warren Grimes Prison Gerrymandering Inquiry SOS_Hodges_0000218- SOS_Hodges_0000220
137.				*	2021-10-14 Emails Warren Grimes Gross Prison Gerrymandering Inquiry SOS_Hodges_0000221- SOS_Hodges_0000223
138.				*	2021-10-18 Emails Warren Grimes Gross Prison Gerrymandering Inquiry SOS_Hodges_0000225-- SOS_Hodges_0000227
139.				*	2021-10-18 Email Warren, Grimes, Gross Prison Gerrymandering Inquiry SOS_Hodges_0000228-- SOS_Hodges_0000231
140.				*	2021-10-18 Emails Grimes Warren Prison Gerrymandering Inquiry

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
					SOS_Hodges_0000232-- SOS_Hodges_0000235
141.				*	2021-10-19 Email Toman Warren Great to Meet SOS_Hodges_0000236-
142.				*	2021-10-20 Email Warren Grimes Gross Prison Gerrymandering questions SOS_Hodges_0000237-- SOS_Hodges_0000238
143.				*	2021-10-20 Emails Grimes Warren Gross Prison gerrymandering questions SOS_Hodges_0000239-- SOS_Hodges_0000241
144.				*	2021-10-20 Email Warren Grimes Prison Gerrymandering questions SOS_Hodges_0000242-- SOS_Hodges_0000244
145.				*	2021-10-20 Email Warren Toman Great to Meet SOS_Hodges_0000245-- SOS_Hodges_0000246
146.				*	2021-11-11 Email Warren to Florida Redistricting P-001655
147.				*	2021-11-11 Plan 42 Suggestion Form P-001666-67
148.				*	2021-11-15 Email Toman Warren Reapportionment Maps SOS_Hodges_0000287
149.				*	2021-11-15 Email Warren Toman Reapportionment Maps SOS_Hodges_0000288
150.				*	2021-11-15 Email Warren Toman Reapportionment Maps SOS_Hodges_0000289-- SOS_Hodges_0000290
151.				*	2021-11-15 Email Warren Toman Reapportionment Maps SOS_Hodges_0000291-- SOS_Hodges_0000292
152.				*	2021-11-15 Email Warren Toman Reapportionment Maps SOS_Hodges_0000293-- SOS_Hodges_0000294
153.				*	2021-11-16 Email Toman Warren Reapportionment Maps

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					SOS_Hodges_0000301-- SOS_Hodges_0000303
154.				*	2021-11-16 Email Warren Bradley Congressional map submissions SOS_Hodges_0000304- SOS_Hodges_0000304
155.				*	2021-11-16 Warren Appearance Card P-000477
156.				*	2021-11-17 Email Betta to Schorch Question/Clarification SEN-0003291
157.				*	2021-11-17 Email Betta to Schorch re Question/Clarification SEN-0003288-SEN-0003289
158.				*	2021-11-17 Email Heffley to Warren SEN-0004248-SEN-0004249
159.				H	2021-11-17 Email Warren to Cassels P-001653
160.				*	2021-11-17 Warren Appearance Card P-000647
161.				H	2021-11-18 Email Warren to Cassels P-001654
162.				*	2021-11-22 Email Warren Grimes Next redistricting committee meetings SOS_Hodges_0000307
163.				*	2021-11-22 Email Warren Grimes Next redistricting committee meetings SOS_Hodges_0000308-- SOS_Hodges_0000309
164.				*	2021-11-22 Rodrigues Memo re Appearance Forms SOS_Hodges_0002909 Ferrin Dep. Ex. 14
165.				*	2021-11-24 Letter Bailey to Senate P-001657 Ferrin Dep. Ex. 15
166.				*	2021-12-08 Letter Warren to Senate SOS_Hodges_0000310 Ferrin Dep. Ex. 16
167.				*	2022-01-23 Messages Warren Grimes

Exhibit No.	Date Identified	Date Admitted	Witness	Objection	Description of Exhibit
					SOS_Hodges_0000311
168.			Warren	F, R	2024-04-10 Email Betta to Fineout Malave SEN-0003271
169.			Warren	F, R	2024-04-24 Email Rey to Warren SEN-0003272-SEN-0003273
170.			Warren	Email- F, R letter- none	2021-11-22 Email Betta to Mears Rojas SEN-0001661-SEN-0001663
171.			Ferrin, Warren	F	2021-11-29 Email Morris to Rojas Ferrin SEN-0001676-SEN-0001677
172.			Warren	F	2021-11-29 Email Rojas to Mears Betta Nordby SEN-0001629-SEN-0001630 Ferrin Dep. Ex. 17
173.			Ferrin, Warren	F	2021-12-09 Email Kulavic to Rojas Ferrin SEN-0001679-SEN-0001680
174.			Warren	F	2021-12-09 Email Rojas to Mears Betta SEN-0001626-SEN-0001627
175.				A, F, H, R	Matthews Dep. Ex. 4, BVM v. Byrd - Jt. Stip. to Narrow Issues for Resolution
176.				A, C, F, H, R	Matthews Dep. Ex. 3, Common Cause v. Byrd - Trial Transcript Excerpt
177.				F, H, R	2024-10-01 Nordby Email re Deposition Dates
178.				*	Senate's Answer and Affirmative Defenses
179.				*	Secretary's Answer and Affirmative Defenses
180.				A, F, R	Complaint Fig. 1, Enacted Plan
181.				A, F, R	Complaint Fig. 4, Caldwell Plan
182.				R	Ferrin Dep. Ex. 1, Senate 30(b)(6) Notice of Deposition
183.				A, F, H, R	Ferrin Dep. Ex. 12, Historical Maps, p. 4
184.				A, F, H, R	Ferrin Dep. Ex. 19, 2022 Redistricting Process Timeline
185.			Warren	A, F, H, R	2020-08-31 Email Ethics & Elections A.A. Applications SEN-0007390
186.			Warren	A, F, H, R	2021-11-18 Email Morgan to Whitaker SEN-0007236-0007238
187.			Warren	A, C, F, H, R	2021-09-08 Email Ramirez SEN-0007239-0007240

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188.			Warren	A, F, H, R, C	2021-09-01 Email McKee to Ramirez SEN-0007241
189.			Warren	A, F, H, R	2021-08-27 Dream Defenders Governor's Supp. Briefing Attachment to Email SEN-0007242-0007248
190.			Warren	A, F, H, R	2021-08-27 Dream Defenders Williams' Supp. Briefing Attachment to Email SEN-0007249-0007256
191.			Warren	A, F, H, R	2021-08-27 Dream Defenders Plfs' Sentence Diagrams Attachment to Email SEN-0007257-0007264
192.			Warren	A, F, H, R	2024-04-05 Email Warren to Rey SEN-0005938-0005939